

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

KIMBERLI RIDGEWAY

CIVIL ACTION NO. 5:10-cv-01843

VERSUS

JUDGE STAGG

UNIVERSAL ENSCO, INC.

MAGISTRATE JUDGE HORNSBY

MOTION TO APPEAR PRO HAC VICE
AND TO WITHDRAW CO-COUNSEL

NOW INTO COURT, through undersigned counsel, comes UNIVERSAL ENSCO, INC., defendant herein, which respectfully submits the following:

1.

Daniel J. Schuch is an associate in the firm of Cozen O'Connor, P.C., of Houston, Texas, and one of the attorneys for defendant in this action.

2.

He is a member in good standing of the bar of the State of Texas. Attached as Exhibit 1 is a Certificate of Good Standing.

3.

Pursuant to Local Rule 20.06, there has been no disciplinary proceedings or criminal charges instituted against him.

4.

He authorizes the Clerk of Court for the Western District of Louisiana to transmit notice of entries of judgments and orders to him under Fed.R.Civ.P. 77, Fed.Cr. P. 49, LR 5.7.10W. He also agrees to receive notice electronically from other parties and the Court via electronic mail. He understands that electronic mail filter software (SPAM filter) may interfere with receipt of

email notices and has verified that any such software installed on his computer or network will not filter our messages sent from enoticing@lawd.uscourts.gov. He understands this electronic notice will be in lieu of notice by any other means. He understands it is his responsibility to advise the Clerk's Office promptly in writing of any physical address changes and/or update his electronic mail address within the Court's electronic filing system.

5.

Defendant also desires that Alfonso A. Kennard be allowed to withdraw as co-counsel of record.

WHEREFORE, DEFENDANT, UNIVERSAL ENSCO, INC., PRAYS that an order issue herein allowing Daniel J. Schuch to enroll as co-counsel for defendant, Universal Ensco, Inc., and allowing Alfonso A. Kennard to withdraw as co-counsel for defendant, Universal Ensco, Inc.

Respectfully submitted,

COZEN O'CONNOR, P.C.

By: /s/Daniel J. Schuch
Charles H. Wilson, TX Bar #00797678
Federal Bar No. 34581
cwilson@cozen.com
Daniel J. Schuch, TX Bar #24051305
Federal Bar No. 890703
dschuch@cozen.com

Wells Fargo Plaza
1000 Louisiana, Suite 5400
Houston, TX 77002-5013
Telephone: 713/750-3100
Telecopier: 713/750-3101

**ATTORNEYS FOR UNIVERSAL ENSCO,
INC.**

LOCAL COUNSEL:

/s/Michael D. Lowe
Michael D. Lowe, Bar No. 29323
Cook, Yancey, King & Galloway, APLC
333 Texas Street, Suite 1700
P.O. Box 22260
Shreveport, LA 71120-2260
Telephone: 318/221-6277
Telecopier: 318/227-7850
michael.lowe@cookyancey.com

CERTIFICATE

I HEREBY CERTIFY that a copy of the above and foregoing has been filed electronically with the Clerk of Court using the CM/ECF system. I also certify that said copies have been served on opposing counsel through the CM/ECF system.

Shreveport, Louisiana, this 13th day of December, 2011.

s/ Michael D. Lowe
OF COUNSEL